



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

December 9, 2019

Ms. Ellen Kondracki  
Vice President, Sustainability & EHS  
Becton, Dickinson and Company  
1 Becton Drive  
Franklin Lakes, NJ 07417

Dear Ms. Kondracki:

Pursuant to section 114 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) is collecting information related to hazardous air pollutant emissions at ethylene oxide (EtO) commercial sterilization facilities to inform its review of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for this sector. As part of this effort, the EPA requires your assistance in providing information related to these emissions. If Becton, Dickinson and Company has previously provided information, the EPA appreciates your cooperation. However, in order to support an effective rulemaking, more information will be required.

We are requesting information regarding EtO commercial sterilization operations at the facilities specifically listed below and wholly owned by Becton, Dickinson and Company, as well as any EtO commercial sterilization facilities wholly owned by Becton, Dickinson and Company that are not included on this list:

Facility	Street Address	City	State
BD (Becton, Dickinson and Company)	1211 Mary Magnan Boulevard	Madison	GA
BD (Becton, Dickinson and Company)	8195 Industrial Boulevard	Covington	GA
BD Medical - Pharmaceutical Systems	920 19th Street East	Columbus	NE
BD Medical	9450 State Street	Sandy	UT

The request is a survey in Microsoft® Excel format. We request that you complete and return the survey by February 6, 2020. Please download the spreadsheet and Instructions Document at: <https://www.epa.gov/stationary-sources-air-pollution/ethylene-oxide-emissions-standards-sterilization-facilities>. If there is a facility on this list not wholly owned by Becton,

Dickinson and Company, please indicate that in the response letter. A completed survey is not required for that facility.

This section 114 request is designed to collect information on emissions from EtO sterilization operations, including sterilization chamber vents, aeration room vents, chamber exhaust vents, and fugitive emissions<sup>1</sup> at the facilities. The Instructions Document contains a summary of the instructions for completing and submitting responses to this survey request.

The survey request is designed to collect emissions information, which by law cannot be confidential business information (CBI). Submit the requested information to the EPA according to the instructions provided in Section 4 of the Instructions Document. **You are required to return all requested information to the EPA on or before the schedule due date specified in this letter.**

Supplemental information is contained in the following enclosures:

Description	Enclosure #
EPA's Information Gathering Authority Under Section 114 of the Clean Air Act	Enclosure 1
Disclosure of Emissions Data Claimed as Confidential Under Sections 110 and 114(c) of the Clean Air Act	Enclosure 2
Summary of Procedures for Safeguarding Clean Air Act Confidential Business Information	Enclosure 3
Designation of RTI International as Authorized Representative	Enclosure 4

This request is one step in an established public process for collecting foundational information as part of NESHAP reviews. The public and stakeholders will continue to have an opportunity to comment on the EtO commercial sterilization NESHAP review in the future, including a formal notice-and-comment period on any proposed action.

If you have questions regarding this survey, please contact Jonathan Witt in the EPA's Fuels and Incineration Group at 919-541-5645 or [witt.jon@epa.gov](mailto:witt.jon@epa.gov).

Thank you for your assistance in this effort. The data will provide comprehensive information about the EtO commercial sterilization source category, which will lead to more effective rulemaking.

Sincerely,



Penny Lassiter  
Division Director  
Sector Policies and Programs Division

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<sup>1</sup> Defined as emissions of EtO which are not routed through the existing control equipment

4 Enclosures

cc: Jim Gulliford, Regional Administrator, U.S. EPA Region 7  
Gregory Sopkin, Regional Administrator, U.S. EPA Region 8  
Ken Mitchell, U.S. EPA Region 4  
Amy Bhesania, U.S. EPA Region 7  
Carl Daly, U.S. EPA Region 8  
Karen Hays, Georgia Environmental Protection Division  
Kevin Stoner, Nebraska Department of Energy and Environment  
Bryce Bird, Utah Division of Air Quality